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UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

John Doe,  
  
Plaintiff,  
  
v.

Donald J. TRUMP, in his official capacity,  
President of the United States of America, et al.  
  
Defendants.

Case No. 4:25-cv-03140-JSW

**NOTICE OF ADDITIONAL  
LEGAL AUTHORITIES**

Judge: Hon. Jeffrey White  
Hearing Date: Aug. 22, 2025  
Hearing Time: 9:00 a.m.

Zhuoer Chen, et al.,  
  
Plaintiffs,  
  
v.

Kristi NOEM, in her official capacity,  
Secretary of the U.S. Department of Homeland  
Security, et al.  
  
Defendants.

Case No. 4:25-cv-03292-JSW

**NOTICE OF ADDITIONAL  
LEGAL AUTHORITIES**

Judge: Hon. Jeffrey White  
Hearing Date: Aug. 22, 2025  
Hearing Time: 9:00 a.m.

S.Y., et al.,

Plaintiffs,

v.

Kristi NOEM, in her official capacity,  
Secretary of the U.S. Department of Homeland  
Security, et al.

Defendants.

Case No. 4:25-cv-03244-JSW

**NOTICE OF ADDITIONAL  
LEGAL AUTHORITIES**

Judge: Hon. Jeffrey White  
Hearing Date: Aug. 22, 2025  
Hearing Time: 9:00 a.m

J.C., et al.,

Plaintiffs,

v.

Kristi NOEM, in her official capacity,  
Secretary of the U.S. Department of Homeland  
Security, et al.

Defendants.

Case No. 4:25-cv-03502-JSW

**NOTICE OF ADDITIONAL  
LEGAL AUTHORITIES**

Judge: Hon. Jeffrey White  
Hearing Date: Aug. 22, 2025  
Hearing Time: 9:00 a.m

W.B.,

Plaintiff,

v.

Kristi NOEM, in her official capacity,  
Secretary of the U.S. Department of Homeland  
Security, et al.

Defendants.

Case No. 4:25-cv-03407-JSW

**NOTICE OF ADDITIONAL  
LEGAL AUTHORITIES**

Judge: Hon. Jeffrey White  
Hearing Date: Aug. 22, 2025  
Hearing Time: 9:00 a.m

1 Plaintiffs, through undersigned counsel, hereby notify the Court of the following  
2 additional legal authorities in support of their Opposition to Defendants' Motion for Stay  
3 Pending Appeal and respectfully request that the Court accept the submission even though it is  
4 a few minutes late.<sup>1</sup>

- 5 - *Child Trends, Inc. v. U.S. Dep't of Educ.*, No. 25-1154-BAH, 2025 WL 2379688, at \*19-  
6 20, n.20 (D. Md. Aug. 15, 2025)
- 7 - *Am. Federation of Teachers v. U.S. Dep't of Educ.*, No. SAG-25-628, 2025 WL 2374697,  
8 at \*32 (D. Md. Aug. 14, 2025)
- 9 - *Coalition for Humane Imm. Rights v. Noem*, No. 25-cv-872 (JMC), 2025 WL 2336415,  
10 at \*1 (D.D.C. Aug. 13, 2025)

11 Dated: August 21, 2025

Respectfully submitted,

/s/ Johnny Sinodis

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cv-03323-JSW & 25-cv-03383(JSW)  
(Related to 25-cv-3140)

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1 For the Court's ease of review, Counsel for the Case Numbers listed on the caption page are filing the same Notice of Additional Legal Authorities in support of Plaintiffs' Opposition to Defendants' Motion for Stay Pending Appeal.

*Doe v. Trump, et al.*, No. 4:25-cv-03140-JSW

NOTICE OF ADDITIONAL LEGAL AUTHORITIES

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cv-03407-JSW